

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CODA DEVELOPMENT s.r.o., CODA)	
INNOVATIONS s.r.o., and FRANTISEK)	
HRABAL,)	Case No. 5:15-CV-01572-SL
)	
Plaintiffs)	JUDGE SARA LIOI
)	
v.)	
)	
THE GOODYEAR TIRE & RUBBER)	
COMPANY and ROBERT BENEDICT,)	
)	
)	
Defendants.)	
)	

THE PARTIES' STIPULATIONS OF FACT

Pursuant to the Court's Final Pre-Trial Conference and Trial Order (Doc. #: 263), Plaintiffs, Coda Development s.r.o., Coda Innovations s.r.o., and Frantisek Hrabal, and Defendants, The Goodyear Tire & Rubber Company and Robert Benedict, submit the following agreed stipulations of fact:

1. Representatives of Goodyear met with representatives of Coda on January 15, 2009.
2. Representatives of Goodyear met again with representatives of Coda on June 15, 2009.
3. Goodyear did not move forward with a joint development project with Coda.
4. U.S. Patent No. 8,042,586 issued on October 25, 2011.
5. U.S. Patent No. 8,113,254 issued on February 14, 2012.

Respectfully submitted,

/s/ John C. Evans (with email permission)

Calvin P. Griffith (0039484)
cpgriffith@jonesday.com
David M. Maiorana (0071440)
dmaiorana@jonesday.com
John C. Evans (0081878)
jcevans@jonesday.com
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114

Attorneys for Defendants

Respectfully submitted,

/s/ Scott M. Richey

Boyd Cloern (*Pro Hac Vice*)
bcloern@steptoe.com
Leah Quadrino (*Pro Hac Vice*)
lquadrino@steptoe.com
Scott M. Richey (*Pro Hac Vice*)
srichey@steptoe.com
Joseph Ecker
jecker@steptoe.com
Steptoe & Johnson LLP
1330 Connecticut Ave., NW
Washington, DC 20036
Telephone: (202) 429-3000
Facsimile: (202) 429-3902

Stephen W. Funk (0058506)

funk@ralaw.com

Emily K. Anglewicz (0083129)

eanglewicz@ralaw.com

Roetzel & Andress, LPA

222 South Main Street

Akron, OH 44308

(T) 330.376.2700

(F) 330.376.4577

Attorneys for Plaintiffs

PROOF OF SERVICE

The foregoing was filed electronically with the Court on August 8, 2022. Notice of this filing was sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Scott M. Richey